

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department 1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691



April 17, 2017

Doug Darnell, Senior Planner City of Riverside

Sent via e-mail: ddarnell@riversideca.gov Cc: david.brunzell@yahoo.com

RE: Proposed City of Riverside 2014-2021 Housing Element Update Project, City of Riverside; Corona North, Riverside West, and Riverside East USGS Quadrangles, Riverside County, California

Dear Mr. Darnell:

Government Code §65352.3 requires **local governments** to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places in creating or amending general plans, including specific plans. Attached is a consultation list of tribes traditionally and culturally affiliated with the area that may have cultural places located within the boundaries of the project referenced above.

As a part of consultation, the NAHC recommends that local governments conduct record searches through the NAHC and California Historic Resources Information System (CHRIS) to determine if any cultural places are located within the area(s) affected by the proposed action. A record search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed for the area of potential project effect (APE) referenced above with negative results. Please note that the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources in any APE. Records maintained by the NAHC and CHRIS are not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of tribal cultural resources.

The list should provide a starting place to locate areas of potential adverse impact within the APE. I suggest you contact all of those listed, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those on the list, your organization will be better able to respond to claims of failure to consult. If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes on the attached list, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at my email address: gayle.totton@nahc.ca.gov.

Sincerely,

ayl∉ Totton, M.A., PhD.

Associate Governmental Program Analyst

Agua Caliente Band of Cahuilla Indians

Jeff Grubbe, Chairperson 5401 Dinah Shore Drive Palm Springs, CA, 92264

Phone: (760) 699 - 6800 Fax: (760) 699-6919 Cahuilla Luiseno

Augustine Band of Cahuilla Mission Indians

Amanda Vance, Chairperson P.O. Box 846

Coachella, CA, 92236 Phone: (760)398-4722 Fax: (760)369-7161 Cahuilla

Cabazon Band of Mission Indians

Doug Welmas, Chairperson 84-245 Indio Springs Parkway

Indio, CA, 92203 Phone: (760)342-2593 Fax: (760)347-7880 Cahuilla

Cahuilla

Kumeyaay

Kumeyaay

Cahuilla Band of Indians

Luther Salgado, Chairperson 52701 U.S. Highway 371

Anza, CA, 92539 Phone: (951) 763 - 5549

Fax: (951) 763-2808 Chairman@cahuilla.net

Campo Band of Mission Indians

Ralph Goff, Chairperson

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Campo, CA, 91906 Phone: (619)478-9046 Fax: (619)478-5818

rgoff@campo-nsn.gov

Ewiiaapaayp Tribal Office

Robert Pinto, Chairperson 4054 Willows Road

Alpine, CA, 91901

Phone: (619)445-6315 Fax: (619)445-9126 Ewilaapaayp Tribal Office

Michael Garcia, Vice Chairperson

Kumeyaay

Gabrieleno

Gabrieleno

Gabrielino

Gabrielino

Gabrielino

4054 Willows Road Alpine, CA, 91901

Phone: (619) 445 - 6315 Fax: (619) 445-9126

michaelg@leaningrock.net

Gabrieleno Band of Mission Indians - Kizh Nation

Andrew Salas, Chariperson

P.O. Box 393 Covina, CA, 91723

Phone: (626) 926 - 4131

gabrielenoindians@yahoo.com

Gabrieleno/Tongva San Gabriel Band of Mission Indians

Anthony Morales, Chairperson

P.O. Box 693

San Gabriel, CA, 91778 Phone: (626) 483 - 3564

Fax: (626)286-1262 GTTribalcouncil@aol.com

Gabrielino /Tongva Nation

Sandonne Goad, Chairperson

106 1/2 Judge John Aiso St.,

#231

Los Angeles, CA, 90012 Phone: (951)807-0479

sgoad@gabrielino-tongva.com

Gabrielino Tongva Indians of California Tribal Council

Robert Dorame, Chairperson

P.O. Box 490

Bellflower, CA, 90707 Phone: (562) 761 - 6417

Fax: (562) 761-6417 gtongva@gmail.com

Gabrielino-Tongva Tribe

Linda Candelaria, Co-Chairperson

23453 Vanowen Street West Hills, CA, 91307

Phone: (626) 676 - 1184

palmsprings9@yahoo.com

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 6097.98 of the Public Resources Code.

This list is only applicable for consultation with Native American tribes under Government Code Sections 65352.3 and 65362.4 et seq for the proposed City of Riverside 2014-2021 Housing Element Update EIR Project, Riverside County.

Jamul Indian Village

Erica Pinto, Chairperson P.O. Box 612

Jamul, CA, 91935 Phone: (619)669-4785 Fax: (619)669-4817 Kumeyaay

La Jolla Band of Luiseno Indians

Thomas Rodriguez, Chairperson

22000 Highway 76 Pauma Valley, CA, 92061 Phone: (760)742-3771 Luiseno

Kumeyaay

Kumeyaay

Cahuilla

La Posta Band of Mission Indians

Gwendolyn Parada, Chairperson

8 Crestwood Road Boulevard, CA, 91905 Phone: (619)478-2113

Fax: (619)478-2125 LP13boots@aol.com

La Posta Band of Mission Indians

Javaughn Miller, Tribal Administrator 8 Crestwood Road

Boulevard, CA, 91905 Phone: (619) 478 - 2113

Fax: (619) 478-2125 imiller@LPtribe.net

Los Coyotes Band of Mission Indians

Shane Chapparosa, Chairperson P.O. Box 189

Warner Springs, CA, 92086-0189

Phone: (760)782-0711 Fax: (760)782-0712 Chapparosa@msn.com Manzanita Band of Kumeyaay

Angela Elliott Santos, Chairperson

P.O. Box 1302

Kumeyaay

Boulevard, CA, 91905 Phone: (619) 766 - 4930 Fax: (619) 766-4957

Mesa Grande Band of Mission Indians

Virgil Oyos, Chairperson

P.O Box 270

Santa Ysabel, CA, 92070

Phone: (760)782-3818 Fax: (760)782-9092

mesagrandeband@msn.com

Morongo Band of Mission Indians

Robert Martin, Chairperson 12700 Pumarra Rroad

Banning, CA, 92220 Phone: (951)849-8807 Fax: (951)922-8146 Cahuilla Serrano

Cupeno

Luiseno

Kumeyaay

Pala Band of Mission Indians

Robert Smith, Chairperson 12196 Pala Mission Road

Pala, CA, 92059

Phone: (760) 891 - 3500 Fax: (760) 742-3189 rsmith@palatribe.com

Pauma Band of Luiseno Indians - Pauma & Yuima Reservation

Temet Aguilar, Chairperson P.O. Box 369, Ext. 303

Pauma Valley, CA, 92061 Phone: (760)742-1289

Fax: (760)742-3422

Luiseno

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Pechanga Band of Mission Indians

Mark Macarro, Chairperson

P.O. Box 1477

Luiseno

Cahuilla

Luiseno

Luiseno

Kitanemuk

Serrano

Tataviam

Temecula, CA, 92593 Phone: (951) 770 - 6000 Fax: (951) 695-1778

epreston@pechanga-nsn.gov

Ramona Band of Cahuilla Mission Indians

Joseph Hamilton, Chairperson

P.O. Box 391670

Phone: (951)763-4105 Fax: (951)763-4325 admin@ramonatribe.com

Anza, CA, 92539

Rincon Band of Mission Indians

Jim McPherson, Tribal Historic

Preservation Officer

1 West Tribal Road

Valley Center, CA, 92082

Phone: (760)749-1051 Fax: (760)749-5144 vwhlpple@rincontribe.org

Rincon Band of Mission Indians

Bo Mazzetti, Chairperson

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Valley Center, CA, 92082

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bomazzetti@aol.com

San Fernando Band of Mission Indians

John Valenzuela, Chairperson P.O. Box 221838

Newhall, CA, 91322

Phone: (760) 885 - 0955 tsen2u@hotmail.com

San Manuel Band of Mission Indians

Lee Clauss, Director of Cultural

Resources

26569 Community Center Drive

Highland, CA, 92346 Phone: (909) 864 - 8933 Fax: (909) 864-3370

lclauss@sanmanuel-nsn.gov

San Pasqual Band of Mission Indians

Allen E. Lawson, Chairperson

P.O. Box 365

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Phone: (760)749-3200 Fax: (760)749-3876

allenl@sanpasqualtribe.org

Santa Rosa Band of Mission Indians

Steven Estrada, Chairperson

P.O. Box 391820 Anza, CA, 92539

Phone: (951) 659 - 2700 Fax: (951) 659-2228

Serrano Nation of Mission

Indians

Goldie Walker, Chairperson

P.O. Box 343

Patton, CA, 92369 Phone: (909)528-9027

Soboba Band of Luiseno Indians

Rosemary Morillo, Chairperson

P. O. Box 487

San Jacinto, CA, 92583

Phone: (951) 654 - 2765 Fax: (951) 654-4198 rmorillo@soboba-nsn.gov

Serrano

Cahuilla

Serrano

Kumeyaay

Cahuilla Luiseno

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Sycuan Band of the Kumeyaay Nation

Cody J. Martinez, Chairperson 1 Kwaaypaay Court El Cajon, CA, 92019

Kumeyaay

Phone: (619)445-2613 Fax: (619)445-1927 ssilva@sycuan-nsn.gov

Torres-Martinez Desert Cahuilla Indians

Mary Resvaloso, Chairperson P.O. Box 1160

Cahuilla

Thermal, CA, 92274 Phone: (760) 397 - 0300 Fax: (760) 397-8146

tmchair@torresmartinez.org

Viejas Band of Kumeyaay Indians

Robert Welch, Chairperson 1 Viejas Grade Road Alpine, CA, 91901

Kumeyaay

Phone: (619) 445 - 3810 Fax: (619) 445-5337 jhagen@viejas-nsn.gov

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NATIVE AMERICAN HERITAGE COMMISSION

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Website: http://www.nahc.ca.gov

Twitter: @CA_NAHC



April 17, 2017

SCH# 2017041039; City of Riverside 2014-2021 Housing Element Update EIR Project, Riverside County,

Doug Darnell City of Riverside 3900 Main Street, 3rd Floor Riverside, CA 92522

sent via e-mail to: ddarnell@riversideca.gov

California

Dear Mr. Darnell:

RE:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form,"

http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
- 3. <u>Mandatory Topics of Consultation If Requested by a Tribe</u>: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
- 4. <u>Discretionary Topics of Consultation</u>: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
- 6. <u>Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:</u> If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

- 7. <u>Conclusion of Consultation</u>: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - **b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - **b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - ill. Protecting the confidentiality of the resource.
 - **c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - **b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

- 1. <u>Tribal Consultation</u>: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code § 65352.3 (a)(2)).
- 2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
- 3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
- 4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
- 2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- **b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - **b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

Gayle Totton, M.A., PhD.

Associate Governmental Program Analyst

cc: State Clearinghouse

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road · Valley Center, California 92082 · (760) 297-2635 Fax:(760) 749-2639



April 18, 2017

Doug Darnell City of Riverside 3900 Main Street, Third Floor Riverside, CA 92522

Re: 2014-2021 Housing Element Update Project

Dear Mr. Darnell:

This letter is written on behalf of Rincon Band of Luiseño Indians. We have received your notification regarding the 2014-2021 Housing Element Update Project and we thank you for the consultation notification. The location you have identified is within the Territory of the Luiseño people.

Embedded in the Luiseño Territory are Rincon's history, culture and identity. The project is within the Luiseño Aboriginal Territory of the Luiseño people however, it is not within Rincon's Historic Boundaries. We do not have any additional information regarding this project but, we defer this project to the Pechanga Band of Luiseño Indians or Soboba Band of Luiseño Indians who are located closer to your project area.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Vincent Whipple

Manager

Rincon Cultural Resources Department



GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians recognized by the State of California as the aboriginal tribe of the Los Angeles basin

City of Riverside 3900 Main St. Third Floor Riverside, CA 92522

Re: AB52 Consultation request for City of Riverside 2014-2021 Housing Element Update Project Located: western Riverside County and is bounded on the north by the unicorporated Riverside County Community of Rubidoux and the cities of Jurupa Valley, Colton and Rilto

Dear Mr. Doug Darnell,

Please find this letter as a written request for consultation regarding the above mentioned project pursuant to Public Resources Code § 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning descending from, a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a "no records found" for the project area. The Native American Heritage Commission, ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. This is the reason the Native American Heritage Commission (NAHC) will always refer the lead agency to the respective Native American Tribe of the area because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & tribal historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. Therefore, to avoid adverse effects to our potential tribal cultural resources on your project site, at the consultation, we will be providing information pertaining to the significance of tribal cultural resources and the significance of the project's impacts to these resources. We will provide a variety of resources including, but not limited to; ethnography notes, maps, and oral history. We will also be prepared to discuss mitigation measures we feel are appropriate to protect our tribal cultural resources from substantial adverse change to their significance.

Consultation appointments are available during standard business hours on Wednesdays and Thursdays at our offices at 901 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email gabrielenoindians@yahoo.com to schedule an appointment.

With Respect,

ays c

Andrew Salas, Chairman

Andrew Salas, Chairman

Nadine Salas, Vice-Chairman

Christina Swindall Martinez, secretary

Albert Perez, treasurer |

Martha Gonzalez Lemos, treasurer |

Richard Gradias, Chairman of the Council of Elders

POBox 393, Covina, CA 91723 www.gabrielenoindians.org

gabrielenoindians@yahoo.com



1995 MARKET STREET RIVERSIDE, CA 92501 951.955.1200 FAX 951.788.9965 www.rcflood.org

211958

April 20, 2017

City of Riverside Community & Economic Development Department 3900 Main Street (3rd Floor) Riverside, CA 92522

Attention: Doug Darnell

Re: D

Draft EIR 2014

2021 Housing Element Update

The District does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District has not reviewed the proposed project in detail and the following checked comment does not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

• The District has no comments at this time.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped flood plain is impacted by this project, the City should require the applicant to obtain a Section 1601/1603 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

Edwin Quinonez EDWIN QUIÑONEZ

Engineering Project Manager

c: Riverside County Planning Department Attn: Kristi Lovelady

DEPARTMENT OF TRANSPORTATION

DISTRICT 8
PLANNING (MS 722)
464 WEST 4th STREET, 6th Floor
SAN BERNARDINO, CA 92401-1400
PHONE (909) 383-4557
FAX (909) 383-5936
TTY (909) 383-6300
www.dot.ca.gov/dist8



Serious drought Help save water!

April 24, 2017

City of Riverside Community and Economic Development Department Doug Darnell 3900 Main Street, Third Floor Riverside, CA 92522

Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project (Riv State Route-91 and Interstate-215)

Mr. Darnell,

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) for the above named report. The update is for several elements of the General Plan: The Housing Element identifies and analyzes the projected housing needs and articulates the City's official policies for the preservation, conservation, improvement, and production of housing within the city.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. Under the California Environmental Quality Act (CEQA), we are required to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Riverside due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS.

We recommend the following to be provided:

Traffic

- The issues of greatest concern to Caltrans are those that may impact traffic circulation and increase demand on State Transportation Facilities. For all major new developments within the City that may require new or improved access, new signals or any improvements at or near State Highway Systems that will require close coordination with Caltrans. This requirement should be included in the Land Use and Circulation Elements of the General Plan and the Environmental Impact Report.
- In the Circulation Element, the City should include a policy and/or goal to work with Caltrans to develop needed improvements to the State Highway System within the jurisdiction of the City of Riverside, particularly for the State Route-91 intersections.

Mr. Darnell April 24, 2017 Page 2

- The Department has interest in working cooperatively to establish a Traffic Impact Fee (TIF) program with the City of Riverside. Local development project applicants would pay their "fair share" to an established fund for future transportation improvement projects. If a TIF program is already in place, or a new TIF program is being considered, the Department would like an opportunity to participate in the process.
- The Circulation Element should acknowledge the Departments' standard of maintaining a
 target Level of Service (LOS) at the transition between LOS D and LOS E on State
 highway facilities. For future projects that may impact State facilities, the Department
 recommends the City continue to work with the Department on thresholds of significance
 related to all State facilities that experience unacceptable LOS (worse than the operating
 standard of LOS D).
- Encourage mixed-use development, preferably near transit services.
- Provisions for noise mitigation measure along the railroad track in the residential area.

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Talvin Dennis at (909) 806-3957 or myself at (909) 383-4557 for assistance.

Sincerely,

MARK ROBERTS
Office Chief

Intergovernmental Review, Community and Regional Planning

Wale Bleets



COUNTY OF RIVERSIDE

TRANSPORTATION AND LAND MANAGEMENT AGENCY



Juan C. Perez, P.E., T.E. Director of Transportation and Land Management

Transportation Department

Patricia Romo, P.E. Director of Transportation

May 2, 2017

Doug Darnell, AICP Senior Planner City of Riverside 3900 Main Street, Third Floor Riverside, California 92522

RE: Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project

Dear Mr. Darnell,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of Riverside 2014-2021 Housing Element Update Project.

The Riverside County Transportation Department (County) requests that the City coordinate any potential changes to its Circulation Element with County Transportation and Planning Departments to address inter-jurisdictional road classification transitions, if any. Any traffic analyses prepared for the City Housing Element should address potential impacts and mitigation measures on any Riverside County roadways designated in the Riverside County General Plan. Necessary improvements to mitigate project impacts shall be identified, and responsibility for the needed improvements shall be designated. The County requests that its Traffic Study Guidelines be followed for the impact analysis for facilities within Riverside County. The most current version of the Traffic Study Guidelines can be found on the County website: http://rctlma.org/trans/General-Information/Pamphlets-Brochures.

Mr. Doug Darnell, AICP May 2, 2017 Page 2

Thank you again for the opportunity to review the NOP. We look forward to receiving the Draft EIR for the project. Please contact me at (951) 955-2016 with questions or comments.

Sincerely,

Russell Williams

Development Review Manager

Russell William

RUW:KKT:TT:rg

cc: Juan C. Perez, Director of Transportation and Land Management Patricia Romo, Director of Transportation Mojahed Salama, Deputy Director of Transportation

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



03-013-2017-006

May 04, 2017

[VIA EMAIL TO:ddarnell@riversideca.gov] City of Riverside Mr. Doug Darnell Planning Division, 3900 Main Street, 3rd Floor Riverside, CA 92522

Re: Government to Government Consultation for the City of Riverside 2014-2021 Housing Element Update Project

Dear Mr. Doug Darnell,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the City of Riverside 2014-2021 Housing Element Update project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area (TUA). For this reason, the ACBCI THPO requests the following:

- *A copy of the records search with associated survey reports and site records from the information center.
- *A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.
- *Copies of any cultural resource documentation (report and site records) generated in connection with this project.
- *The presence of an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Office and the Agua Caliente Tribal Historic Preservation Office.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6828. You may also email me at hfeeney@aguacaliente.net.

Cordially,

Spund Ferrey

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



Hannah Feeney Archaeological and Archives Technician Tribal Historic Preservation Office AGUA CALIENTE BAND OF CAHUILLA INDIANS

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road · Valley Center, California 92082 · (760) 297-2635 Fax:(760) 749-2639



May 4, 2017

Doug Darnell
City of riverside
Community and Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522

Re: 2014-2021 Housing Element Update Project

Dear Ms. Darnell:

This letter is written on behalf of Rincon Band of Luiseño Indians. We have received your notification regarding the 2014-2021 Housing Element Update Project and we thank you for the consultation notification. The location you have identified is within the Territory of the Luiseño people.

Embedded in the Luiseño Territory are Rincon's history, culture and identity. The project is within the Luiseño Aboriginal Territory of the Luiseño people however, it is not within Rincon's Historic Boundaries. We do not have any additional information regarding this project but, we defer this project to the Pechanga Band of Luiseño Indians or Soboba Band of Luiseño Indians who are located closer to your project area.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Destiny Colocho

Manager

Rincon Cultural Resources Department

From: Darnell, Doug < DDarnell@riversideca.gov>

Sent: Monday, May 08, 2017 11:41 AM

To: Garcia, Rita

Cc: Gonzalez, Alicia; Bartscher, Christina

FW: [External] City of Riverside 2014-2021 Housing Element Update Subject:

Rita,

Please see the message below from Josh Bourgeois requesting to be added to the notification list for the Housing Element.

Thanks,

DD

Douglas A. Darnell, AICP, Senior Planner

3900 Main Street Riverside, CA 92522 Ph: 951-826-5219 Fax: 951-826-5981

e-mail: ddarnell@riversideca.gov

From: Darnell, Doug

Sent: Monday, May 08, 2017 11:38 AM

To: 'Josh Bourgeois' <jbourgeois029@gmail.com>; Unknown <jbourg2271@aol.com>

Subject: RE: [External] City of Riverside 2014-2021 Housing Element Update

Josh,

Thank you for your interest in the City's Housing Element update. We will be sure to add you to the notification list.

DD

Douglas A. Darnell, AICP, Senior Planner

3900 Main Street Riverside, CA 92522 Ph: 951-826-5219

Fax: 951-826-5981

e-mail: ddarnell@riversideca.gov

From: Josh Bourgeois [mailto:jbourgeois029@gmail.com]

Sent: Friday, May 05, 2017 1:06 AM

To: Darnell, Doug <DDarnell@riversideca.gov>; Unknown <jbourg2271@aol.com>

Subject: [External] City of Riverside 2014-2021 Housing Element Update

Mr. Darnell,

Please provide any updates to the above mentioned project.

I am requesting under Public Resource Code Section 21092.2 to add the email addresses and mailing address below to the notification list, regarding any subsequent

environmental documents, public notices, public hearings, and notices of determination for this project.

jbourg2271@aol.com

jbourgeois029@gmail.com

Mailing Address:

P.O. Box 79222

Corona, Ca 92877

Please confirm receipt of this email.

Thank You,

Joe Bourgeois

951-202-2421

South Coast AQMD (909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

May 5, 2017

ddarnell@riversideca.gov Mr. Doug Darnell, AICP City of Riverside 3900 Main Street, Third Floor Riverside, CA 92522

Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). The SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality including the challenge of achieving 45% additional NOx reductions in 2023 and 55% in 2031 that are needed for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

The SCAOMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. The SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is http://www.aqmd.gov/home/library/documents-supportavailable SCAOMD's website at: material/planning-guidance/guidance-document. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. Guidance¹ on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the proposed project, the Lead Agency should identify any potential adverse air quality impacts and sources pf air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and onroad mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the air quality impacts from the overlap should be combined and compared to the SCAQMD's regional operational thresholds to determine significance.

¹ In April 2017, ARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement ARB's Air Quality and Land Use Handbook: A Community Health Perspective. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. Available at: https://www.arb.ca.gov/ch/landuse.htm.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the proposed project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the proposed project, including:

- Chapter 11 of the SCAQMD CEQA Air Quality Handbook
- SCAQMD's CEQA web pages available here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies.
- SCAQMD's Rule 403 Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 Asbestos Emissions from Demolition/Renovation Activities
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

Alternatives

In the event that the proposed project generates significant adverse air quality and health risks impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines §15126.6 (d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.

Permits

In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the proposed project. For more information on permits, please visit the SCAQMD webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (http://www.aqmd.gov).

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D. Program Supervisor, CEQA IGR Planning, Rule Development & Area Sources

LS RVC170413-03 Control Number



AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

CHAIR

May 9, 2017

VICE CHAIRMAN Rod Ballance Riverside

Mr. Doug Darnell, AICP, Senior Planner City of Riverside Planning Division 3900 Main Street, Third Floor

COMMISSIONERS

Riverside CA 92522

Arthur Butler Riverside

RE: Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project and Associated Site-Specific Amendments

Riverside
Glen Holmes

Hemel

John Lyon

Dear Mr. Darnell:

Steve Manos Lake Elsinore

Russell Betts Desert Hot Springs

. .

STAFF

Director Simon A. Housman

John Guerin Paul Rull Barbara Santos

County Administrative Center 4080 Lerron St, 14º Floor Riverside, CA 92501 (951) 955-5132 Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a copy of the Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project. The proposal also includes amendments to land use designations and zoning on up to 395 acres scattered throughout the City, including properties within the Airport Influence Areas of March Air Reserve Base/Inland Port Airport and Riverside Municipal Airport.

As this City-wide amendment involves amendments to land use designations and zoning of properties within the Airport Influence Areas (AIAs) of these airports, as well as amendments to the City's zoning code, this proposal is subject to ALUC review pursuant to Section 21676(b) of the California Public Utilities Code. An official submittal to ALUC for a determination as to the consistency of this project with applicable Airport Land Use Compatibility Plans is mandatory. Complete applications submitted by May 31 are eligible for consideration at ALUC's July 13 public hearing.

www.rcaluc.org

While the majority of the proposed land use designation changes will not present issues relating to airports, we would direct your attention to the site(s) at the southwest corner of Van Buren Boulevard and Barton Road. Please be advised that much of this site is located in Airport Compatibility Zone C2 of the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, where residential densities are limited to a maximum of six dwelling units per acre. Provided that this site is not already committed to higher densities through previous valid land use approvals, a proposal to allow for higher densities "by right" within Zone C2 would likely be determined to be inconsistent by ALUC.

We look forward to continued communications regarding this matter. If you have any questions, please contact the undersigned at (951) 955-0982.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

John J. G. Guerin, Principal Planner

cc: Denise Hauser or Daniel Rockholt, March Air Reserve Base

Gary Gosliga, March Inland Port Airport Authority Kim Ellis, Manager, Riverside Municipal Airport

ALUC Staff

Y:\AIRPORT CASE FILES\Regional\City Riverside 2014-2021 Housing Update Land Use Amdts - Itr to City Darnell.doc



GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians recognized by the State of California as the aboriginal tribe of the Los Angeles basin

City of Riverside 3900 Main St. 3rd Floor Riveerside Community and Economic Development Department Planning Division

May 11, 2017

Re: AB52 Consultation request for the City of Riverside 2014-2021 Housing Element Update Project Located: Citywide

Dear Doug Darnell,

Please find this letter as a written request for consultation regarding the above-mentioned project pursuant to Public Resources Code § 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning descending from, or a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a "no records found" for the project area. The Native American Heritage Commission, ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. This is the reason the Native American Heritage Commission (NAHC) will always refer the lead agency to the respective Native American Tribe of the area because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & tribal historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. Therefore, to avoid adverse effects to our tribal cultural resources, we would like to consult with you and your staff to provide you with a more complete understanding of the prehistoric use(s) of the project area and the potential risks for causing a substantial adverse change to the significance of our tribal cultural resources.

Consultation appointments are available on Wednesdays and Thursdays at our offices at 901 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email gabrielenoindiansayahoo.com to schedule an appointment.

** Prior to the first consultation with our Tribe, we require all those individuals participating in the consultation to view a video produced and provided by CalEPA and the NAHC for sensitivity and understanding of AB52. You can view the video at: http://nahc.ca.gov/2015/12/ab-52tribal-training/

With Respect,

Andrew Salas, Chairman

Andrew Salas, Chairman

Nadine Salas Vice-Chairman

Christina Swindall Martinez, secretary

Albert Perez, treasurer

Martha Gonzalez Lemos, treasurer |

Richard Gradias, Chairman of the Council of Elders

PO Box 393, Covina, CA 91723 www.gabrielenoindians.org

gabrielenoindians@yahoo.com



SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS 818 West 7th Street, 12th Floor Los Angeles, CA 90017 T1 \$2137.230 Iffico: 1. (213) 330 1835 www.scag.ca.gov

REGIONAL COUNCIL OFFICERS

Margaret E. Finlay, Duarte

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second Vice Presidem Bill Jahn, Big Bear Lake

Immediate Past President Michele Martinez, Santa Ana

COMMITTEE CHAIRS

Executive/Administration Margaret E. Finlay, Duarte

Community, Economic & Human Development Rex Richardson, Long Beach

Energy & Environment Carmen Ramirez, Oxnard

fransportation. Curt Hagman, San Bernardino County May 11, 2017

Mr. Doug Darnell, AICP, Senior Planner City of Riverside 3900 Main Street. Third Floor Riverside, California 92522 Phone: (951) 826-5219 E-mail: ddarnell@riversideca.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project [SCAG NO. IGR9228]

Dear Mr. Doug Darnell,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.1 Guidance provided by these reviews is intended to assist local agencies such as local iurisdictions and project proponents to take actions that help contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the City of Riverside 2014-2021 Housing Element Update Project. The proposed project consists of an update to the city's Housing Element and identifies and analyzes the existing and projected housing needs and articulates the City's official policies for preservation, conservation, improvement, and production of housing within the City.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Assistant Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang

Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF RIVERSIDE 2014-2021 HOUSING ELEMENT UPDATE PROJECT [SCAG NO. IGR9228]

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS						
RTP/SCS G1:	Align the plan investments and policies with improving regional economic development and competitiveness					
RTP/SCS G2:	Maximize mobility and accessibility for all people and goods in the region					
RTP/SCS G3:	Ensure travel safety and reliability for all people and goods in the region					
RTP/SCS G4:	Preserve and ensure a sustainable regional transportation system					
RTP/SCS G5:	Maximize the productivity of our transportation system					
RTP/SCS G6:	Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)					
RTP/SCS G7:	Actively encourage and create incentives for energy efficiency, where possible					
RTP/SCS G8:	Encourage land use and growth patterns that facilitate transit and active transportation					
RTP/SCS G9:	Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*					
	*SCAG does not yet have an agreed-upon security performance measure.					

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS							
	Goal	Analysis					
RTP/SCS G1:	Align the plan investments and policies with improving regional economic development and competitiveness	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference					
RTP/SCS G2:	Maximize mobility and accessibility for all people and goods in the region	Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference					
etc.		etc.					

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf. The growth forecasts for the region and applicable jurisdictions are below.

11.	Adopted SCAG Region Wide Forecasts			Adopted City of Riverside Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	336,300	384,100	386,600
Households	6,458,000	7,325,000	7,412,300	101,200	117,700	118,600
Employment	8,414,000	9,441,000	9,871,500	157,900	195,900	200,500

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.